



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 15, 2014

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Room 201  
New York, New York 10007

**Re: *United States v. Tyrone Brown, et al.*, S2 13 Cr. 345 (LGS)**

Dear Judge Schofield:

The Government writes this letter to update the Court on the status of the defendants after plea negotiations and the scheduling of a suppression hearing regarding defendant Tyrone Brown's motion to suppress his post-arrest statements.

First, the Government has been informed that defendant Steven Glisson wishes to plead guilty pursuant to a plea agreement with the Government, and the parties have scheduled a change of plea proceeding before the Magistrate Court to take place on August 21, 2014. The Government has not reached a disposition with defendants Tyrone Brown and Antione Chambers, and, therefore, expects that Brown and Chambers will be proceeding to trial.

Second, the Government is currently determining the availability of witnesses Special Agent John Reynolds of the Federal Bureau of Investigation and Detective Ellis Deloren of the New York City Police Department for a suppression hearing during the week of September 8, 2014. As the Court is aware, Special Agent Reynolds and Detective Deloren are the case agents in *United States v. David Delva*, S2 12 Cr. 802 (KBF), which is scheduled for trial on September 8, 2014. The prosecutor in charge of the *Delva* matter is currently on vacation and will return next week. Once she returns, we will be better able to determine which dates and times for a suppression hearing would least conflict with the *Delva* trial. We will submit a letter to the Court as soon as possible next week with proposed dates for the suppression hearing.

Respectfully submitted,

PREET BHARARA  
United States Attorney  
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cc: All Defense Counsel of Record (By ECF)